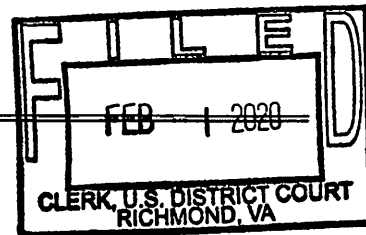


AO 91 (Rev. 11/11) Criminal Complaint



UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

United States of America

v.

MICHAEL J. COOLONG

Defendant(s)

Case No. 3:20MJ

14

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Nov. 17, 2019 - Feb. 1, 2020 in the county of Chesterfield in the
Eastern District of Virginia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2422(b)

Attempted Coercion and Enticement

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

Kaitlin G. Cooke

Kaitlin G. Cooke

Cedric Jefferson
Complainant's signature

Special Agent Cedric Jefferson

Printed name and title

Sworn to before me and signed in my presence.

Date: 2/1/2020

City and state: Richmond, Virginia

/s/ Roderick C. Young
Roderick C. Young

United States Magistrate Judge

I, Cedric Jefferson, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice, and have been so employed by the FBI since January 2015. I am currently assigned to the Richmond Field Office, Richmond, Virginia. I am assigned to the Child Exploitation Task Force that conducts investigations pertaining to child sex trafficking, child pornography, and child abductions. As part of my duties, I have received training regarding the investigation of various federal crimes including, but not limited to, child exploitation, complex financial crimes, civil rights and public corruption. By virtue of my FBI employment, I perform and have performed a variety of investigative tasks, including conducting arrests and the execution of federal search warrants and seizures. As a Special Agent, I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7).

2. I am thus an officer of the United States who is empowered by law to conduct investigations of, and make arrests for, offenses enumerated in Title 18, United States Code, Sections 2251, 2252, 2252A, and 2422 involving child exploitation offenses.

3. The statements in this affidavit are based in part on your affiant's investigation of this matter and on information provided by other law enforcement agents. I make this affidavit in support of a criminal complaint charging the following individuals, MICHAEL J COOLONG, with Attempted Coercion and Enticement, in violation of 18 U.S.C. § 2422(b).

4. This affidavit is being submitted for the limited purpose to show merely that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my

knowledge about this investigation. I have set forth facts that I believe are sufficient to charge COOLONG with the criminal conduct set forth herein.

RELEVANT STATUTORY PROVISIONS

5. **Coercion and Enticement:** 18 U.S.C. § 2422(b) provides that whoever, using the mail or any facility or means of interstate or foreign commerce, knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be imprisoned not less than 10 years or for life.

6. **Taking Indecent Liberties with Children:** VIRGINIA CODE ANNOTATED § 18.2-370 provides that it is a Class 5 felony for a person 18 years of age or over, who, with lascivious intent, knowingly and intentionally commits any of the following acts with any child under the age of 15 years:

- a. (1) Expose his or her sexual or genital parts to any child to whom such person is not legally married or propose that any such child expose his or her sexual or genital parts to such person; or
- b. (3) Propose that any such child feel or fondle his own sexual or genital parts or the sexual or genital parts of such person or propose that such person feel or fondle the sexual or genital parts of any such child; or
- c. (4) Propose to such child the performance of an act of sexual intercourse, anal intercourse, cunnilingus, fellatio, or anilingus or any act constituting an offense under § 18.2-361 l; or
- d. (5) Entice, allure, persuade, or invite any such child to enter any vehicle, room, house, or other place, for any of the purposes set forth in the preceding subdivisions of this subsection.

1 VA. CODE ANN § 18.2-361, entitled "Crimes against nature," criminalizes bestiality as a Class 6 felony and incestuous sexual activity as a Class 3 or Class 5 felony, depending on the age of the child involved.

7. Use of Communications System to Facilitate Offenses Involving Children:

VIRGINIA CODE ANNOTATED § 18.2-374.3 provides that it is a Class 5 felony for “any person 18 years of age or older” to use a communications system,² including but not limited to computers or computer networks or bulletin boards, or any other electronic means, for the purposes of soliciting, with lascivious intent, any person he knows or has reason to believe is a child younger than 15 years of age to knowingly and intentionally” engage in any of the following acts:

- (1) Expose his sexual or genital parts to any child to who he is not legally married or propose that any such child expose his sexual or genital parts to such person;
- (2) Propose that any such child feel or fondle his own sexual or genital parts or the sexual or genital parts of such person or propose that such person feel or fondle the sexual or genital parts of any such child;
- (3) Propose to such child the performance of an act of sexual intercourse, anal intercourse, cunnilingus, fellatio, or anilingus or any act constitution an offense under § 18.2-361; or
- (4) Entice, allure, persuade, or invite any such child to enter any vehicle, room, house, or other place, for any purposes set forth in the preceding subdivisions.

PROBABLE CAUSE

8. The FBI Richmond Division’s Child Exploitation Task Force located in Virginia conducted an undercover operation targeting subjects willing to travel in order to engage in sexual conduct with a minor. During the operation, online covert employees (“OCEs”) used a covert social media account to pose as an adult intermediary who had access to a female minor. The OCEs posted profiles on an online platform and subsequently responded to subjects who indicated a desire to meet with the female minor.

² Section 18.2-374.3 defines “use a communications system” to mean “making personal contact or direct contact through any agent or agency, any print medium, the United States mail, any common carrier or communication common carrier, any electronic communications system, the Internet, or any telecommunications, wire, computer network, or radio communications system.”

9. An OCE posted one such undercover ("UC") profile on "Alt.com." Alt.com is a network for members interested in alternative forms of sexual relationships and friendship. Users can bond over fetishes, kinks, and BDSM (Bondage, Discipline, Sadism, and Masochism), as well as explore the site's large stockpile of sexual videos, articles, and other content. The UC profile noted that the user was an adult female from Chesterfield, Virginia. It also included a list of kinks to include "Adult Breastfeeding", "Daddy/babygirl", "mom/son", "young/old," "Mommy/Daddy play," and "taboo family."

10. On November 17, 2019, an individual utilizing the user name "mikeden57" contacted the OCE through the UC profile on Alt.com. "mikeden57" wrote, "Hi im mike". The OCE responded, "Hi Mike I'm Becca". "mikeden57" wrote, "Nice to meet you what are you seeking" and "You married divorced single kids". The OCE replied, "Single with a 10 yr old daughter You?". "mikeden57" wrote, "I'm divorced looking for a daddy for her" and "Tell me what your seeking". "mikeden57" explained, "What kind of dom you seeking im very dominant". The OCE replied, "I'm looking for a strong daddy for my family". "mikeden57" wrote, "Then I think we should get to know each other" and asked, "You have other way we can talk". "mikeden57" continued, "So you want a very strong dominant daddy to", "A man to dominate the family", and "I think you know what's being said". The OCE provided "mikeden57" with their username on Kik and "mikeden 57" replied, "Ok see you there".

11. The Alt.com profile for "mikeden57" stated that he was a 62-year-old male from Old Orchard Beach, Maine and included a photograph of a grey-haired male standing on a covered deck wearing a burgundy t-shirt and jeans. In the "Introduction" section, the profile stated:

Been into bondage over 40 years extreme to lite up to you I seek ltr sub or slave let's talk and see what happens I live in old orchard beach Maine mile from beach very easy going all is needed know is one to enjoy with me making her dream a reality as well.

The section also listed "mikeden57"'s "Ideal Person" as "Something real". The profile listed "mikeden57"'s birthdate as "June 25, 1957" and his occupation as "truck driver".

12. A short time later on November 17, 2019, the OCE and the suspect continued their conversation via Kik, which is an online mobile messaging application used for instant messaging. The suspect's Kik user id was "mikeden57." In this summary and all those that follow the term "OCE" refers to the adult female's identity unless otherwise indicated. Additionally, all of the chats that follow summarize those exchanges that your affiant believes establish probable cause. They do not purport to be verbatim recitations of the Kik chats that occurred between the OCE and "mikeden57" on the dates described and do not purport to recount each and every conversation between the OCE and "mikeden57".

13. "mikeden57" began their first Kik chat by writing, "Hi im mike from site". After the two connected, "mikeden57" wrote, "So how strong you want your family daddy be honest" and the OCE replied, "The way I look at life is as long as everyone is having fun I'm pretty open". "mikeden57" agreed, "Same", "Trust me". "mikeden57" then wrote, "Trying to be very discreet an not say to much but I think you know where I'm going as daddy", "An you want a very strong dominant daddy don't you", and "Is that the kind of daddy you want for daughter". The OCE replied, "It is". "mikeden57" responded, "So we are on same page then". After the two discussed the need to be discreet and the difficulty of finding like-minded people, "mikeden57" stated, "Daddy to make all of us happy". "mikeden57" added, "If your serious this could be a very rewarding family". The OCE replied, "I am", to which "mikeden57" replied, "Same here I've been looking a long time", "Hard to find". "mikeden57" then asked, "What's my daughter's name" and the OCE replied with the fictional 10-year-old female's name. A few

minutes later, "mikeden57" asked if the 10-year-old female could see her mother's phone screen. The OCE replied she could if she showed it to her and the next message sent by "mikeden57" was that of a white male's penis. Later in the conversation, "mikeden57" returned to the photo and, referring to the 10-year-old female, stated, "Be very open with her you 2 are alone ask her in your own words what she really thought about that pic an be honest with me after". The OCE responded, "She was excited," and "She and her have been playing for awhile but she's never had vaginal sex so she was also nervous". "mikeden57" responded, "Mmmmm now its time for daddy to join", "An you won't stop playing am I clear", "I want you to tell an show her where daddy goes I want her reply". When the OCE responded, "I don't know what you mean," "mikeden57" replied, "Point where daddy belongs see what she says tell her that's for daddy" and "Ask her if she wants daddy there".

14. Later in the conversation "mikeden57" asked, "Is this something that we are going to move Forward on"? "mikeden57" also asked if the OCE was his wife and if the 10-year-old female was his daughter, if they could stop looking. When the OCE agreed, "mikeden57" told the OCE to tell the 10-year-old female "you found daddy". The OCE replied, "Yes to everything, my husband". A short while later "mikeden57" wrote, "You have toy ?". The OCE replied, "I have a vibrator", to which "mikeden57" replied, "I want you to start teaching her how to suck it", "So she will be sucken daddy". The OCE later wrote, "Have you ever been a daddy before to a family like this?" and "mikeden57" replied, "Yes I have" and later said that daughter was 8 years old.

15. "mikeden57" later stated, "I may take my vac there in .va what do you think about that," "In a couple weeks". The OCE responded, "YES", and "mikeden57" replied, "Just have to figure out where im going to stay". The OCE said, "My house obviously" and "mikeden57"

responded, “Mmmm”, “You sure”, and “It will be about 9 days”. After the two discussed using the time as a trial run, “mikeden57” said that they could “train [the 10-year-old female] right”, “Will have 9 days to make her a real woman”.

16. On November 19, 2019, while chatting with the OCE on Kik, “mikeden57” asked, “So when im there for that week who’s going to be home”, “Me an my daughter ?” The OCE asked, “When are you planning on coming in?” and “mikeden57” responded, “First week dec”.

17. In a chat later that same day, the OCE asked, “What’s the youngest you’ve ever been with?” and “mikeden57” replied, “6”. The OCE asked him to elaborate and “mikeden57” replied, “When we are alone I will ok” and “Told you I don’t like saying too much online”. Later, as the two discussed what they might try sexually, the OCE said, “Maybe we could watch our favorite porn with each other and get ideas”. “mikeden57” responded, “So you like porn,” “What kind”? The OCE replied, “Pretty standard stuff Lesbian gangbang bondage”, “I don’t know how to find what I’m really looking for”, and “I normally just use pornhub like everyone else”. “mikeden57” then asked, “What is it your looking for”? The OCE replied, “I think you know Haha”, “But I have the real thing so it’s not a big deal”. “mikeden57” responded, “Family taboo family incest try them” and “You’ll find”. When the OCE replied, “They don’t have that stuff on pornhub”, “mikeden57” said, “Then ill get you there ☺”, “Good girl”, and “I’m am glad we found each other”. The OCE responded, “Me too” and “mikeden57” replied that he hoped the 10-year-old female is to. When the OCE said, “She is too”, “mikeden57” responded, “Good you told her to not ever say anything right”? The OCE replied, “Of course I told her that She’s 10 I’m not going to prison”.

18. On November 20, 2019, while chatting with the OCE on Kik, “mikeden57” sent an image of an adult, white female performing oral sex on a white male’s erect and ejaculating

penis. The female is holding the neck of a second, younger white female, whose face is directly below the male's penis. The male's semen is running down the second female's cheek. When he sent this image, "mikeden57" said, "This will be you an [the 10-year-old female]". Later in the chat, as the two discussed their first sexual experiences, "mikeden57" wrote, "Who was your first" and the OCE replied, "Don't judge me but it was my older brother". "mikeden57" replied, "I've never judge you because I've done my two sisters and two aunts", "8 an 10 sisters". "mikeden57" said he was 14 years of age at the time, but that his sexual contact with his sisters only lasted a few months because "My sister threatened to tell my mom and dad if I didn't stop". When the OCE later asked about his sexual contact with his aunts, "mikeden57" said he would tell the OCE, "when I come", "We need something to talk about".

19. As the two discussed the OCE's contact with the purported 10-year-old daughter, "mikeden57" stated, "The thing is I'm telling you right straight up I am going to bury it deep inside her pussy" and "I'm going to put it in just as deep as I can go". "mikeden57" later said that, after he was done, the 10-year-old female's "Pussy will be stretched open just like yours is". Shortly thereafter, "mikeden57" said, "Wait to you see my cum dripping out of it", "Then I shove it right back in", "Pound her Pussy some more", and "you seeing that big Cock going in an out of that tiny hole". "mikeden57" also brought up the 10-year-old female's development, "And you know that she will start developing real quick to after that don't you", "Tits growning women thing", "Starting her monthly", "Wait till the first time I pull out covered in cherry blood". When the OCE agreed that the OCE would "love to see her become a woman like that", "mikeden57" said, "You will see it first hand", "Mmmmmm", and "Few more weeks". The OCE responded, "I'm counting the days", and "mikeden57" replied, "Me to", "I'm trying to get a load down there so I can drop it off take my vacation right there". When the OCE said, "That

would be perfect”, “mikeden57” asked, “There any truck stops around you”, “What town you in exactly”? After the OCE said that the OCE lived in Chesterfield County, “mikeden57” said, “You have a pilot right there in South Chesterfield” and, shortly thereafter, “You also have one there in Chester”. The OCE said, “Oh ok I’ve never really had to look for one so I guess I’ve never noticed”. “mikeden57” responded, “Lol”, “Then you can come pick me up”.

20. On November 23, 2019, when “mikeden57” believed he was chatting directly with the 10-year-old female for the first time, he sent a picture of a white male’s exposed penis and asked her if she liked it and what she would do with it. When the OCE, posing as the 10-year-old female, said, “I’ve had it one in my hand and mouth before,” “mikeden57” wrote, “You want to suck it”? The OCE replied, “If u want me 2”, to which “mikeden57” replied, “Yes I do”. “mikeden57” next wrote, “You want me to put in you to”? The OCE replied, “Where??” and “mikeden57” replied, “Pussy”. When the OCE asked if it would hurt, “mikeden57” responded, “Little bit at first but that will stop”. When the OCE said, “I don’t want it to hurt”, “mikeden57” responded, “Ill be gentle”. “mikeden57” also said, “Ask mom how good it feels in there”. During the exchange that followed, “mikeden57” also told the OCE, who he then believed to be the 10-year-old female, to “Tell mom you want me to Fuck you”, “Tell daddy you want his big Cock”, “Tell mom daddy has a big Cock for you both”, and “Tell mom your Pussy is mine”. “mikeden57” then asked, “Good you feel better now talking to me” and the OCE said, “Ya I do”. When “mikeden57” asked, “What are you thinking” and the OCE responded, “Ur nice”, “mikeden57” replied, “Is your Pussy wet”? When the OCE said, “No It’s tingly though”, “mikeden57” responded, “It needs something in it” and told the OCE, “Tell mom your Pussy is tingly”. The OCE responded, “I did” and “mikeden57” replied, “An what she say”? When the

OCE said, "She asked what I need in it", "mikeden57" responded, "What did you tell her", "Did you tell her daddy's big cock"?

21. On November 27, 2019, during a Kik chat with the OCE, "mikeden57" wrote, referring to the 10-year-old female, "That makes you happy knowing that she wants that cock buried in her don't you out". The OCE replied, "Very happy" to which "mikeden57" replied, "And watching me drip out of her down my shaft my balls", "Seeing that pussy stretched to the max", and "What gave her some sheer lingerie thong panties sheer panties". "mikeden57" then instructed the OCE to check the websites for Victoria's Secret and Adam & Eve to look for lingerie for the 10-year-old female. Later in the day "mikeden57" sent several links with thumbnails of women in lingerie and wrote, "For you both", "That's true Adam and Eve". "mikeden57" later asked if the OCE had shown the lingerie to the 10-year-old female. When the OCE said they had, "mikeden57" responded, "Ask her if she like to wear them for daddy show daddy her Pussy". The OCE replied, "She said she would She said she wants to make you happy". "mikeden57" then said, "Ask her what she would like to do to make daddy happy". The OCE responded, "She said she'd do anything you want" and "mikeden57" replied, "Ask her if she likes to suck daddy's cock", "An have daddy cum in her mouth".

22. On December 2, 2019, during a Kik chat with the OCE, "mikeden57" said that he wanted the OCE and 10-year-old female to enjoy life with him, writing, "I'm a mile from the beach amusement park in water slides only a mile", "An Drive-In movie theater". The OCE responded, "Sounds like you live in a great town" and "mikeden57" replied, "Old orchard beach Maine look it up". When the OCE said, "I will", "mikeden57" said, "Then when home watch as much porn as you an [the 10-year-old female] want". After the two discussed what type of porn the OCE watched, the OCE asked, "What's your favorite type of porn?" "mikeden57"

responded, "Lesbian an daddy daughter", "Family taboo". "mikeden57" added, "You know when your not home [the 10-year-old female] and I will be watching it some to right", "You know her Pussy is daddy's an mouth". Later, "mikeden57" said, referring to the 10-year-old female, "I can't wait till the day I take her cherry", "I want you to watch me take it". The OCE responded, "I can't wait for that either it's going to be so amazing". "mikeden57" replied, "Yes all the way around she will be so proud", "An you seeing me pull out my blood soaked Cock from her", "Then I put it back in her", "An fill her". The OCE responded, "Oh yes", "Then what?". "mikeden57" replied, "I keep fucken her till I fill her", "You kissing me her kissing me", "Then after im done cuddle her an kiss her," "Hold her". The OCE said, "That would be so loving", to which "mikeden57" responded, "Very", "Letting her know how proud we are of her", "Both of us". The OCE said, "That's beautiful" and "mikeden57" responded, "I hope she don't cry to much".

23. Shortly after this exchange, "mikeden57" sent several pictures of a red motorcycle and wrote, "You know I have a motorcycle right", "Harley-Davidson Wide Glide". One of the pictures had a black SUV in the background and "mikeden57" wrote, "That's my car in back ground". The OCE asked, "What type of car do you have? I have an odyssey". "mikeden57" responded, "Cadillac Escalade". Next, "mikeden57" sent several pictures of outdoor areas, including a deck with a privacy fence and a large yard, which he described as his "deck an back yard".

24. On December 3, 2019, during a Kik chat with the OCE, "mikeden57" sent several pictures of a white male and his various tattoos. "mikeden57" implied the pictures were of himself and his various tattoos. The pictures that included the male's face appear to be of the same individual as in the pictures on "mikeden57"'s Alt.com profile.

25. On December 6, 2019, during a Kik chat with the OCE, "mikeden57" asked if the 10-year-old female would "sleep with us or her own bedroom and bed". The OCE responded, "In her own room Otherwise it would be too crowded for regular sleep". "mikeden57" replied, "Ok so then I just go to her bed at times ?", "So you hear her moaning". The OCE agreed and asked, "Can I join you?", "Or Will that be private?". "mikeden57" responded, "Of course", "At times it will be but mostly family affair", "We all have fun". "mikeden57" added, "I will be speaking time alone with though", "Spreading", "At times it will be just her an I alone". When the OCE asked, "What will you be doing?", "mikeden57" responded, "Talking to her ☺", "The same things you an I will be doing ☺", "Or letting her enjoy sucken on me", "Letting her swallow daddy's seeds". Shortly thereafter, "mikeden57" added, "Going to teach her how to lick my shaft an balls to".

26. On December 9, 2019, during a Kik chat, "mikeden57" instructed the OCE to kiss the 10-year-old female "Tongue an all". "mikeden57" then told the OCE to "spread your legs" and "Tell her tongue your pussy". When the OCE said, "We're still dressed", "mikeden57" responded, "Tell her to rub", "Get undressed". When the OCE indicated they were naked, "mikeden57" said, "Open your legs for her an tell her to rub it". After the OCE indicated they had done so, "mikeden57" instructed, "Tell her to kiss it". When the OCE said that the 10-year-old was, "mikeden57" said, "You want to ride her face don't you". The OCE responded, "I would love that" and "mikeden57" replied, "Tell her to lick your pussy". When the OCE said that the 10-year-old was, "mikeden57" instructed, "Open your legs an lay back for her". As the OCE continued to affirm that the 10-year-old was then performing oral sex, "mikeden57" encouraged the OCE to "Fun in her", "Cum", and "Tell her how good she is doing". After the OCE affirmed that they had, "mikeden57" continued, "Move your hips on her face", "Fuck her

face”, “Tell how good she’s making daddy feel to”. When the OCE responded, “She wants to know what you’re doing”, “mikeden57” said, “Rubbing my Cock some”. After the OCE told “mikeden57” that the 10-year-old had completed the sex act, he told the OCE to “Kiss her”, “Lick your juices”, and “Feel her Pussy an tell me how wet she is”. When the OCE told “mikeden57” that the 10-year-old was “still dressed”, he responded, “Put your hand down her panties”. When the OCE affirmed that the 10-year-old was “very” wet, “mikeden57” responded, “She needs daddy now” and directed the OCE to ask the 10-year-old “where she wants daddy”. The OCE responded, “She said in her mouth” and “mikeden57” replied, “She want daddy’s cum ask her in her mouth”. The OCE responded, “She said she does”. After the OCE indicated that they were still touching the 10-year-old female’s genitals, “mikeden57” asked the OCE, “You like what your feeling” and directed the OCE to “Rub her clit” and “Tell her to think of your finger as daddy’s cock”. After asking for a picture of the OCE, “mikeden57” added, “Ok rub her good”, “Make her cum”. At the end of this conversation, “mikeden57” asked the OCE when they could speak by phone.

27. On December 10, 2019, in a Kik chat with “mikeden57” the OCE wrote, “I bought a few minutes and have a break coming up What’s your phone number?” in reference to “mikeden57” requesting to speak with the adult on the phone. “mikeden57” replied, “***-***-6936”. Later in the day, a different OCE called the number “mikeden57” provided and spoke with a male, who identified himself as Mike. The conversation was recorded. During the call, Mike said that he noticed the 10-year-old was “getting very open”. He then asked if things between the OCE and the 10-year-old had “improved”. He clarified, “Enjoying each other in the bedroom?” When the OCE told Mike that he had helped and that the 10-year-old was more open, he responded, “And a lot wetter.” When the OCE agreed, Mike said that it showed “one

thing”, that the 10-year-old was “definitely ready”. When the OCE asked what to do now, Mike said, “We just keep talking and, well, we can get together. We’re going to have to get together. I’m going to hopefully try to get a load down towards that way and, if nothing else, so we can meet and talk and stuff like that, you know, and then make plans on you guys coming here, you know, after she is out of school and stuff like that.” He added, “I’d love to have you guys come up when she’s on vacation, you know, school vacation, or something like that.” A short time later, Mike said he would not ask for a picture of the 10-year-old. When the OCE affirmed that they had a lot to lose, Mike agreed, “Yes, we both do.” When the OCE said that they were not looking for any trouble, Mike responded, “Exactly, what we do is what we do, nobody else’s business.” Later in the call, Mike indicated that he is frequently in Virginia. When the OCE asked when he would be here next, Mike said he had to use his vacation to get his car fixed. After this call, “mikeden57” told the OCE in their Kik chat, “I enjoyed our talk”, “I’m more at ease now”. “mikeden57” then proceeded to describe in detail in the Kik chat several sex acts he wanted to perform on the 10-year-old female.

28. On December 13, 2019, during a Kik chat with the OCE, “mikeden57” sent a photograph of an exposed, white male’s penis and told the OCE to “Show her”, referring to the 10-year-old. After telling the OCE to ask the 10-year-old “what she would do” and “if she wants daddy to stretch her”, the OCE asked if “mikeden57” wanted to talk to the 10-year-old. The OCE then began posing as the 10-year-old female. Believing he was talking with the child, “mikeden57” asked, “So you want daddy to stretch you out”? When the OCE said, “Ya”, “mikeden57” asked, “What else you want daddy to do”? The OCE responded, “I don’t no”, “What do u want”? “mikeden57” replied, “Kiss rub you”. “mikeden57” then asked the OCE what she thought about kissing, what she felt when kissing, whether she touches herself, and

what she thinks about when she does. "mikeden57" also asked the OCE what she thought about him. When the OCE said, "I think u r big", "mikeden57" asked, "An do you like that"? When the OCE said, "I think I will", "mikeden57" said, "That make you nice an tingly", "You want that big Cock inside you don't you"? "mikeden57" then told the OCE to "Tell mom you want daddy's big Cock", "Tell her you think about it slot", "Alot". "mikeden57" asked the OCE what she was wearing, confirmed that she had "panties" on and then told her to "Take them all off" and "Tell mom I'm making your Pussy tingly". He then asked the OCE, "Your Pussy wet" and "Mom looking at you"? When the OCE answered both in the affirmative, "mikeden57" told the OCE to "Open your legs", "Wide", and "Tell mom to feel your Pussy", "Ask her to rub your pussy". "mikeden57" asked the OCE to affirm that the adult female was doing this and, when they did so, asked, "How's it feel"? When the OCE said, "Real good", "mikeden57" responded, "Tell mom you want daddy's big Cock there". A short time later, "mikeden57" told the OCE to "Ask mom to lick it", "Tell her to kiss you first", and then "Tell mom to kiss you deep". After the OCE affirmed that this felt good, "mikeden57" said, "Tell mom your daddy's horny little slut", "And need his big cock". He then asked the OCE, "Are you daddy's horny little slut"? When the OCE said, "I am", "mikeden57" responded, "Say it". The OCE replied, "I'm daddy's horny little slur", "Slut". "mikeden57" said, "Good girl" and asked "How your pussy". When the OCE responded, "I'm gonna come", "mikeden57" instructed the OCE to "Tell mom suck my Pussy im going to cum", "Cum for daddy", "Ride moms lips". After the OCE said they orgasmed, "mikeden57" said, "Wish daddy's Cock made you cum", "Daddy will cum in you to", "Cum in your Pussy an your mouth". He then told the OCE to "Have her rub your Pussy again", "Tell mom to start rubbing it". When the OCE affirmed, "She is" and said "I've never done it again after I came", "mikeden57" responded, "You will cum again". A short time later,

“mikeden57” told the OCE to “Tell mom just like this I need to fuck” and “Ask her wet you are now”. When the OCE said, “She said soaked”, “mikeden57” responded, “Tell mom to eat your Pussy again”. When the OCE said that she was, he told her to “Move your hips up man down on moms lips”, “Up and down”. He also told the OCE to “Tell mom to suck on your clit” and “Tell mom your a slut”. When the OCE said, “I’m gonna come”, “mikeden57” said, “Cum for daddy”. After discussing whether it felt good, he added, “Just think when daddy Fuck a you that you will cum a couple times to”. A short time later, he asked the OCE, “Who does your Pussy belong to”? When the OCE responded, “U”, “My daddy”, “mikeden57” said, “Yes”, “That’s right”. Shortly thereafter, “mikeden57” told the OCE that they could give the phone back to the adult female, after which he and the OCE, again posing as the adult female, discussed various additional sex acts that they would engage in with the 10-year-old. “mikeden57” also asked the OCE to recount various details of the sex act that he had just directed.

29. On December 26, 2019, during a Kik chat with the OCE, after “mikeden57” and OCE discussed various sex acts that they would perform on each other and the 10-year-old female, the OCE asked “mikeden57” if he wanted to talk with the 10-year-old. During the conversation that followed, “mikeden57” told the OCE, then posing as the 10-year-old, that he had been thinking about her a lot, specifically “How much daddy wants you”. “mikeden57” asked the OCE, “Do you think of daddy”? As the conversation progressed, “mikeden57” asked the OCE what the OCE wanted to do with him. After the two discussed having sex, “mikeden57” told the OCE, “I want you to kiss mom like we talked about then whisper in her ear you want daddy to Fuck your tiny Pussy an fill it with cum”. As the conversation progressed, “mikeden57” asked what the OCE was wearing and then directed the OCE to remove their clothes, “Panties to”. When the OCE indicated they had, “mikeden57” told the OCE to “Lay

back spread your legs an say im so fucken horny". "mikeden57" asked the OCE, "You want to cum"? When the OCE said, "Uh huh", "mikeden57" told the OCE, "Tell mom lick my Pussy". When the OCE said, "She is", "mikeden57" said, "Ask her you like my Pussy mom". "mikeden57" also told the OCE to "Tell mom you like her Lucien your pussy", "Tell mom suck daddy Pussy im his slut", "Tell mom your my slut", "To pick your Pussy for daddy", "Lick". When the OCE said that it felt good, "mikeden57" told the OCE to "Move your hips up an down on her lips", "Keep moving up an down on her lips". When the OCE affirmed that they were, "mikeden57" said, "Tell mom your fucken her face". After the OCE indicated they had orgasmed, "mikeden57" told the OCE to "Tell her to undress" in reference to the adult and asked "You want to lick moms Pussy"? When the OCE said, "Ya," "mikeden57" said, "Tell her undress your going to eat her pussy". The OCE then purported to return the phone to the adult who affirmed, "She's licking me". "mikeden57" gave the adult similar instructions as they continued talking, including "Tell her your going to Fuck her face an cum" and "Move your hips up an down". "mikeden57" also asked the OCE whether they liked various acts that he had directed the 10-year-old to do. When the OCE said, "You are teaching us new things," "mikeden57" responded, "Just think when we are together".

30. On December 29, 2019, during a Kik chat with the OCE, "mikeden57" directed further sex acts between the adult and 10-year-old females, directing them to "Get undressed" and "keep rubbing each other". "mikeden57" asked the OCE "how wet" the 10-year-old was. When the OCE said, "Soaked", "mikeden57" asked the OCE, "How's that make you feel" and whether "She wet enough to take me in ?" "mikeden57" directed the OCE to ask the 10-year-old "why is she so wet" and for the 10-year-old to say "how wet" the adult female was. When the OCE responded, "She said I'm soaked too", "mikeden57" told the OCE to "Rub her clit faster"

and "Ask her what would she like in her Pussy right now". The OCE then purported to hand the phone to the 10-year-old while the OCE performed oral sex on the child. As "mikeden57" and the OCE posing as the 10-year-old discussed that act, "mikeden57" told the OCE, "Tell mom you want daddy's big Cock fucken your Pussy hard", "Tell her you need that cock".

"mikeden57" asked the OCE, "You want that cock"? When the OCE said, "I do", "mikeden57" responded, "Where do you want that cock"? When the OCE said, "In my kissy", "Pussy", "mikeden57" replied, "Fucken you hard don't you". "mikeden57" then sent an image of an exposed, partially erect white male's penis and said, "You want that cock", "Tell mom your going to suck my Cock dry". When the OCE asked, "Is that yours?", "mikeden57" responded, "Yes, I just took pic". A short time later, after the OCE indicated they had orgasmed, "mikeden57" told the OCE to "Tell mom to keep eating your pussy", "Tell her to eat it again", "Keep eating it". When the OCE responded, "She said she will", "mikeden57" told the OCE to "Ride her lips like I told you before", "Move your hips". "mikeden57" also directed the OCE to "Tell mom your moving your hips just like you was fucken daddy" and "Tell mom suck your clit". When the OCE said they were going to "cum again", "mikeden57" told the OCE "Cum". Afterward, "mikeden57" said, "Kiss mom", "Tell mom that was great". "mikeden57" then asked, "You want to eat mom"? When the OCE said, "Ya", he told the OCE to "Pass. Her the phone an eat her". After the OCE re-assumed the role of the adult female, "mikeden57" told the OCE "Ride. Her. Face.", "Tell her to suck your clit".

31. On January 7, 2020, during a Kik chat, "mikeden57" and the OCE agreed that the OCE would perform oral sex on the 10-year-old girl. "mikeden57" told the OCE, "Ill talk with her you do", "As you do". The OCE responded, "Ok I'm handing her the phone". Believing he was then talking with the 10-year-old female, "mikeden57" instructed the OCE to "tell mom to

lick you". When the OCE said they did, "mikeden57" asked, "You horny ain't you" and "You need daddy's big cock". As the two discussed where the 10-year-old "needs it most", "mikeden57" said, "You want to suck that big Cock don't you" and instructed the 10-year-old to "Tell mom you want to" and "Tell mom you want to milk daddy's big Cock dry". When the OCE affirmed that the adult female was still performing oral sex on the 10-year-old as directed, "mikeden57" told the OCE to "Tell her lick my Pussy slut", "Ask her you like this pussy". As the conversation continued, "mikeden57" repeatedly directed the OCE to tell her mom that she "needed" his penis. "mikeden57" also told the OCE, "Your going to cum a Lot when im fucken you", "Cumming all over daddy's cock", "Then daddy will fill you with cum". After the OCE purported to return the phone to the adult female, "mikeden57" asked the OCE how the experience was and if the OCE "like[s] what she says to you". The two continued discussing the sex act and what "mikeden57" had directed the 10-year-old to say during it when they resumed their Kik chat the next morning.

32. On January 9, 2020, during a Kik chat with the OCE, "mikeden57" told the OCE, "Me but I found out I might be going to nc Feb 1st". The OCE responded, "Oh very nice", "So close". "mikeden57" replied, "Yes so ill stop to see you on my way there ☺". After asking the OCE to tell the 10-year-old female that he said hi, "mikeden57" said, "Would be nice I can spend a few hours with you both", "You come pick me up go to your house an get very acquainted". After they discussed whether the OCE would pick him up at the travel center, "mikeden57" added, "I need to calm my 2 ladys", "Claim". The OCE responded, "we'll soothe our hard working mans aching muscles." "mikeden57" replied, "I'm sure you will", "An you know what muscles is aching most". When the OCE asked, "which one?", "mikeden57" responded, "Hmmmm lets see", "The one muscle my lady's need most". The two then

exchanged various memes suggestive of oral sex and sexual pleasure. Later in the chat, “mikeden57” said, “So im not sure in nc im going but its loading the 31 Jan so I should have Friday sat sun to get there only need day half”. The OCE responded, “So I can meet you on the 31st?” and “mikeden57” replied, “That should give me all day sat”, “I just know it’s loading the 31st I don’t know if it’s in the morning afternoon or night”. When the OCE said they were flexible, “mikeden57” responded, “So if I have all day Saturday would be nice”.

33. On January 12, 2020, during a Kik chat “mikeden57” asked the OCE whether the 10-year-old female had “seen you fucken your Cunt with vib?” When the OCE said, “She hasn’t”, “mikeden57” confirmed that the OCE had a vibrator and then said, “I think its time she watched you”. When the OCE said that they could do that now and asked, “Would you like that?”, “mikeden57” responded, “Yes because I want her to see an know just what my Cock is going to do”. When the OCE told “mikeden57” that the two were in the OCE’s bedroom and asked, “How do you want me to do this?”, “mikeden57” responded, “Show her the vib an tell her this is going to be like daddy’s cock”. “mikeden57” added, “Your going to show her what daddy’s Cock an where daddy’s Cock will go”. The two then agreed that the OCE would give the phone to the 10-year-old. “mikeden57” asked the OCE, who was then posing as the 10-year-old, “Mom naked” and “Did you see her toy”? When the OCE said they had, “mikeden57” asked, “Where do you think that’s going”? The OCE responded, “She said her pussy” and “mikeden57” replied, “Yes what she doing now”. The OCE said, “She’s rubbing it on the outside of her pussy”. “mikeden57” asked, “What it making you feel like”? The OCE responded, “Tingly” and “mikeden57” told the OCE, “Get naked to”. When the OCE indicated they had, “mikeden57” asked, “You wet” and, when the OCE said, “Ya”, told the OCE to “Tell mom your Pussy is getting wet”. A short time later, “mikeden57” asked, “What’s mom doing

now”? The OCE responded, “She’s putting it inside now” and “mikeden57” asked, “You like seeing that”? When the OCE said, “Luv it”, “mikeden57” asked, “You want daddy’s Cock to do that to you”? “mikeden57” also told the OCE, “You know other name for Pussy” and the OCE replied, “What”, to which “mikeden57” replied, “Its called a Cunt to”. The two discussed that “cunt” was a dirty word and “mikeden57” told the OCE, “You can only say it at home an when I say you can ok”. “mikeden57” then told the OCE, “Whisper in moms ear how’s your Cunt feeling say it just that way ok” and “Tell me what she says”. When the OCE responded, “She said that was fantastic,” “mikeden57” told the OCE, “Now tell her you need my Cock in your Cunt fucken you hard” and “Tell me what she says”. After the OCE told “mikeden57” that the adult female had orgasmed and that both were “soaked”, “mikeden57” told the OCE, “Tell mom to lick your Cunt that way”. When the OCE said that they had and affirmed that it felt good, “mikeden57” said, “Tell mom your cunts feeling good”. After the OCE indicated that they had orgasmed, “mikeden57” said, “Wait till daddy opens your cunt”. When the OCE said, “Mom said ur coming soon”, “mikeden57” responded, “yes you want daddy’s big Cock in your cunt”? The OCE replied, “Soooooooooooo much” and “mikeden57” replied, “Say it”. The OCE repeated, “I want ur big cock in my cunt” and “mikeden57” told the OCE “Tell mom that”, “Same way”. Shortly thereafter, the OCE resumed the role of the adult female and the two discussed how the 10-year-old had responded to the sex act, including “how wet” she had been. When the OCE agreed that the 10-year-old was “getting wetter” every day, “mikeden57” responded, “means her Cunt is opening more to”. Later in the chat, the two discuss the importance of making sure the 10-year-old understood the need to keep their lifestyle a secret.

34. On January 13, 2020, during a Kik chat with the OCE, “mikeden57” told the OCE that he was traveling for work and “I may watch a movie on my tablet later”. A short while later,

“mikeden57” added, “Could watch some daddy daughter ☺”. When the OCE asked how he would find that, “mikeden57” responded, “I just punch it in an get it”. He also said, “I do family taboo incest,” “You’d be surprised what you find”. The OCE asked, “Using google?” and “mikeden57” responded, “Yes”. When the OCE said, “I’ll definitely try that”, “mikeden57” suggested, “Or daddy deflowered me”, “Fun in me daddy is good to”, “Cum”, “Cum in me daddy”.

35. On January 20, 2020, during a Kik chat with the OCE, “mikeden57” asked to speak with the 10-year-old female. After the two discussed having sexual intercourse, “mikeden57” told the OCE, then posing as the 10-year-old, “Tell mom you want daddy to take your fucken cherry”. The OCE responded, “She said she wants u 2 take it”. “mikeden57” replied, “Shove his big Cock in my Cunt an take what’s his”, “You want me to take it”. The OCE said, “Oh yeah” and “mikeden57” responded, “Say it”, “Tell me you want me to take it.” The OCE replied, “I want u 2 take my cherry”. “mikeden57” told the OCE to “Tell mom you want that to” and “Tell mom you want daddy’s Cock deep in your cunt”. “mikeden57” asked, “How’s your Cunt doing”. Shortly after the OCE said, “Wet and tingly”, “mikeden57” told the OCE to “Tell mom your cunts wet”, “Tell mom to feel your Cunt again”, and “Ask mom if she wants to suck on your cunt”. The OCE responded, “She does Start now?” and “mikeden57” replied, “Tell mom to pay attention to how big your hole gets as she sucking on your cunt”. When the OCE indicated that the sex act was occurring, “mikeden57” sent the OCE three images of an exposed, white male’s penis. These images appear to be the same images that “mikeden57” had previously sent during Kik chats with the OCE. “mikeden57” said, “You want that huge Cock in your Cunt don’t you”. After the OCE indicated that they had orgasmed, “mikeden57” said, “Tell mom keep suken your Cunt you need to fucken cum again” and “Tell

mom look at my Cunt hole is it bigger opening". The OCE responded, "She said a little" and asked, "What do u want me 2 say when I cum". "mikeden57" replied, "Fucken cum in me daddy im your cunt", "Fuck my tiny Cunt daddy".

36. Later in the conversation, "mikeden57" told the OCE, who was still posing as the 10-year-old, "Ask mom what your cherry is". When the OCE said, "She told me", "mikeden57" asked, "What do you think"? The OCE responded, "I just hope it doesn't hurt". "mikeden57" replied, "Is that cherry daddys" and "It will hurt a tiny bit but will go away". Shortly thereafter, "mikeden57" told the OCE to "Tell mom she can use her vibrator on herself". When the OCE said, "She is", "mikeden57" asked, "You like seeing that"? The OCE said, "I do". "mikeden57" then asked, "What's it do to your cunt" and the OCE responded, "Makes it wet". "mikeden57" then asked, "What's that wet Cunt want" and the OCE said, "Daddy's clock", "Cock". "mikeden57" asked, "Mom put it in her yet". After the OCE said, "She has", "mikeden57" said, "Tell mom Fuck her cunt". The OCE responded, "She said she is fucking her cunt" and "mikeden57" replied, "You see how daddy's Cock will do to your cunt", "Do you see what daddy's Cock will do to your cunt"? When the OCE said, "I do", "It's gonna go al the way in", "mikeden57" asked, "Do you like what your seeing"? The OCE said, "I do" and "mikeden57" directed the OCE to "Tell mom bury that Cock in your cunt".

37. On January 21, 2020, during a Kik chat, the OCE asked, "Any update on the first"? "mikeden57" responded, "No", "But it does unload Monday so if I can take off Friday ill have all day an night sat". The OCE replied, "Ok", "Let me know what works". "mikeden57" said, "I will that will be good if I can stay all day an all night take off Sunday". The two agreed and "mikeden57" added, "Then we won't be so rushed".

38. On January 30, 2020, during a Kik chat with the OCE, "mikeden57" mentioned "We are loading on Friday at 9 so don't know what time ill be there Friday night" and the OCE responded "Ok, Just let me know when you're on the road so I can be ready". "mikeden57" responded, "That I will but looks like sat morning, I hope your real Damn I hope your not a cop". The OCE said they were not a cop and "mikeden57" stated, "I hope you understand my fear on that". Later on the same date, the OCE mentioned "I misunderstood when you said you were picking up your load at 9, Did you mean am or pm". "mikeden57" responded by stating "Am, So I'm really unsure what time I'll get down to Virginia, Depends on how long it takes them to load me its staging and lighting so".

39. On January 31, 2020, during a Kik chat with the OCE, "mikeden57" confirmed that he had finished loading his truck and was en route to Virginia. Later that day, "mikeden57" advised that he was outside of Baltimore, Maryland and would not be able to travel further that day.

40. On February 1, 2020, "mikeden57" contacted the OCE and advised that he had arrived at the Pilot Travel Center in Chesterfield County, Virginia.

41. In addition to the Kik chat exchanges described herein, "mikeden57" engaged in numerous other Kik chat discussions with the OCE in which he repeatedly described in detail various sex acts in which he wanted to engage with the adult female and the 10-year-old daughter, including genital-genital sexual intercourse, oral-genital sexual intercourse, digital-genital contact, and bondage.

IDENTIFICATION

42. Between November 17, 2019 and January 23, 2020, investigators obtained personally identifiable information from "mikeden57"'s Alt.com profile and from information

volunteered during the chat sessions. “mikeden57” revealed that he lives in Old Orchard Beach, Maine, that his first name and last name is “Michael Coolong,” that he is a 62-year-old male, that his birthday is **/**/1957, that he is employed as a truck driver, and that he operates a 2020 Freightliner. Agents also obtained pictures of the suspect from his “mikeden57” Alt.com profile page, and from the chat sessions themselves. Upon receipt of this information, agents utilized open source and FBI databases to identify the suspect as MICHAEL J COOLONG.

43. On December 16, 2019, investigators received subscriber data from Kik for user ID “mikeden57”. The results revealed the account belonged to MICHAEL COOLONG, registered on February 15, 2016, and the email address associated with the account was “mcool5719@gmail.com.”

44. Investigators have also received Verizon subscriber information for phone number ***-***-6936, the number that “mikeden57” directed the OCE to call on December 10, 2019. That number is subscribed in the name of “Michael Coolong” at an address in Old Orchard Beach, Maine.

45. A query of the Department of Motor Vehicles (DMV) database revealed that MICHAEL J COOLONG holds a Maine Commercial Driver’s License (CDL), with an address of record in Old Orchard Beach, Maine that matches the address included in the Verizon subscriber records. The DMV records also showed that MICHAEL J COOLONG has registered 2005 Cadillac Escalade with Maine license plate: 1011N and a Harley Davidson motorcycle with Maine license plate: 891LB. These vehicle descriptions appear to be the same as the vehicles depicted in the images that “mikeden57” sent the OCE in a Kik chat on December 20, 2019. The picture on MICHAEL J COOLONG’S DMV record also appeared to be the same person on “mikeden57”’s Alt.com profile and in the pictures he sent during the chat sessions.

ARREST

46. On February 1, 2020 at approximately 9:30 a.m., law enforcement arrested MICHAEL J COOLONG at the Pilot Travel Center located at 2126 Ruffin Mill Rd, Colonial Heights, VA 23834, within Chesterfield County, Virginia. COOLONG was taken into custody as he approached a vehicle in which the OCE had indicated they would be waiting. COOLONG identified himself as MICHAEL J COOLONG using the same date of birth and Social Security number belonging to the individual described above. COOLONG appears to be the same individual depicted in the images on “mikeden57”’s Alt.com profile and the images that “mikeden57” sent to the OCE via Kik.

47. Immediately before his arrest, COOLONG was communicating with the OCE using his cell phone. COOLONG dropped this phone when taken into custody. When law enforcement retrieved it, the phone was unlocked and displaying COOLONG’s most recent communications with the OCE, who was identified on the phone by the OCE’s name.

CONCLUSION


48. Based on the information detailed above, I respectfully submit there is probable cause to charge MICHAEL J COOLONG with Attempted Coercion and Enticement, in violation of 18 U.S.C. § 2422(b).

Respectfully Submitted,

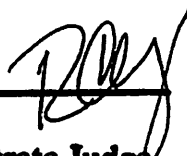

Cedric Jefferson

~~Special Deputy United States Marshal~~
FBI Child Exploitation Task Force
Federal Bureau of Investigation

Seen and approved by:


Kaitlin G. Cooke
Assistant United States Attorney

Subscribed and sworn to before me on February 1, 2020


/s/
Roderick C. Young
United States Magistrate Judge